

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

In re GoodRx and Pharmacy Benefit Manager Antitrust Litigation (No. II)

This Document Applies To:

ALL CASES

Case No.: 1:25-md-03148-MSM-AEM

MDL No. 3148

PLAINTIFFS' STATUS REPORT

Pursuant to the Order of the Court (ECF No. 29), the Plaintiffs¹ submit the below Status Report to update the Court on preliminary scheduling and discovery matters while the Parties await appointment of the case leadership structure.

The Parties² previously submitted a scheduling report in advance of the initial case management conference and expect to engage in further discussions regarding a proposed schedule

¹ Plaintiffs: Keaveny Drug, Inc.; National Community Pharmacists Association; Community Care Pharmacy, LLC; Minnesota Independent Pharmacists; Philadelphia Association of Retail Druggists; Winships Prescription Center, Inc.; AIDS Healthcare Foundation; Old Baltimore Pike Apothecary, Inc.; Smith's Pharmacy II, Inc.; Ritchie Pharmacy, LLC; C&H Pharmacy Inc.; Propst Discount Drugs, Inc.; Reeves Drug Store; Star Discount Pharmacy, Inc.; C&M Pharmacy, Inc.; Katz Pharmacy; Gus Pharmacy, LLC; Melrose Pharmacy; Northern Arizona Pharmacy; ESCO Drug Co.; Valley Health Care, LLC; Prnrx Professional Pharmacy Inc.; Dao Pharmacy, Inc.; Capitol Heights Pharmacy; OneroRx, Inc.; Grey Dog IV; CAAS, LLC; Bueno Pharmacy LLC; SDDDC LLC; Lakhani Rx Inc.; Pressman, Inc.; Weston Pillbox Inc.; Booneville Pharmacy of MS, Inc.; Byhalia Drug Company, LLC; Okolona Pharmacy, LLC; C&C Drugs, Inc.; Superco Inc.; Southwest Pharmacy, Inc.; Guy's Pharmacy of Tylertown; Guy's Pharmacy of Summit; Guy's Pharmacy of Brookhaven; Guy's Pharmacy of Hazlehurst; Guy's Pharmacy of Crystal Springs; AMT Group; Mannino's Family Practice Pharmacy.

² The "Parties" include the Plaintiffs and Defendants GoodRx, Inc.; GoodRx Holdings, Inc.; Express Scripts Inc.; Express Scripts Holding Company; CVS Caremark Corporation; CVS Health Corporation; Caremark LLC; Navitus Health Solutions, LLC; MedImpact Healthcare Systems, Inc.; OptumRx, Inc.; Optum, Inc.; OptumRx Holdings, LLC; Optum Rx Administrative Services, LLC; and United Health Group.

once the Court appoints leadership.

I. Proposed Interim Order [for Limited Discovery]

The Parties are in the process of meeting and conferring cooperatively to finalize the Proposed Interim Order [for Limited Discovery and Preliminary Schedule (the “Proposed Interim Order”)] regarding the confidentiality and production of agreements governing GoodRx’s Integrated Savings Program (the “ISP Agreements”), GoodRx’s Community Link program, and arbitration. The Parties will submit the draft stipulated order in advance of the August 4, 2025 status conference. If the Parties have any disagreements meriting the Court’s intervention, they will submit limited argument with the draft order and be prepared to address those issues during the conference.

Plaintiffs expect that the confidentiality provisions of the Interim Order will be superseded upon entry of a general Protective Order for this Action by the Court. Plaintiffs will work with Defendants to prepare a proposed general Protective Order promptly after entry of any leadership appointment order and in accordance with any scheduling order entered by the Court.

II. Data Discovery

Given the importance of data in this litigation, the Plaintiffs believe that discussions regarding the parameters of data discovery are best left for after the appointment of leadership. However, the Plaintiffs would seek to address data discovery promptly after entry of any leadership appointment order.

III. Appointment of Interim Lead Counsel

Should the Court have any questions about the submitted applications for appointment of Interim Lead Counsel, counsel is prepared to answer them at the August 4, 2025 conference.

Dated: July 28, 2025

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Respectfully submitted,

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